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May 23, 2023

VIA ECF

Judge Vincent L. Briccetti
United States Courthouse
300 Quarropas Street, Room 620
White Plains, NY 10601

Re: *Ramirez v. Bernstein et al.*, No. 7:17-CV-3825 (VB)

Dear Judge Briccetti:

We represent Plaintiff Jose Ramirez in the above-referenced matter. Pursuant to Your Honor's March 27, 2023 Order (ECF 166), we write on behalf of all parties to provide Your Honor with a joint status report on settlement. As we previously advised the Court, the parties reached a settlement in principle (ECF 162) and Plaintiff required time to ensure the settlement agreement is coordinated with Plaintiff's government benefits and social services (ECF 165).

Plaintiff's counsel is pleased to report that it has arranged for an estate planning specialist from the law firm of Walden Macht & Haran LLP to represent Mr. Ramirez *pro bono* in connection with preparing a Supplemental Needs Trust. Barring any unforeseen complications, Plaintiff's counsel anticipates filing a motion for an order creating a Supplemental Needs Trust, as well as a stipulation of settlement, within the next 30 days.

Accordingly, the parties respectfully request a 30-day extension of the stay of discovery and the deadline to file either a stipulation of settlement or a further joint status report.

We thank the Court for its consideration of this matter.

Respectfully submitted,

s/David M. Kusnetz
David M. Kusnetz

CC: All counsel of record (via ECF)